

## Crawford, Kristie

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**From:** tanner@keanelawllc.com  
**Sent:** Monday, September 30, 2024 11:54 AM  
**To:** Crawford, Kristie; 'Nicholas Savio'; ryan@keanelawllc.com  
**Cc:** matt@cliffordsaviolaw.com; Greenwood, Kelly  
**Subject:** RE: Wilkens, P.E. Deposition in Francis v. Wausau Homes & Phillips Builders [BJPC-BJLIB.FID2157956]

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Kristie – let's do a 1pm start time, please. Thanks.

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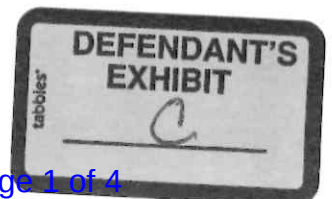
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**Cc:** matt@cliffordsaviolaw.com; Greenwood, Kelly <kgreenwood@bjpc.com>  
**Subject:** RE: Wilkens, P.E. Deposition in Francis v. Wausau Homes & Phillips Builders [BJPC-BJLIB.FID2157956]

I checked my calendar again and can make the morning of 10/10 work as well.



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**From:** Nicholas Savio <[nick@cliffordsaviolaw.com](mailto:nick@cliffordsaviolaw.com)>  
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**Cc:** [matt@cliffordsaviolaw.com](mailto:matt@cliffordsaviolaw.com); Greenwood, Kelly <[kgreenwood@bjpc.com](mailto:kgreenwood@bjpc.com)>  
**Subject:** Re: Wilkens, P.E. Deposition in Francis v. Wausau Homes & Phillips Builders [BJPC-BJLIB.FID2157874]

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I've reserved a conference room at our office for the entire day on 10/10. I'll defer to Tanner and Ryan as far as what time to start.

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**Cc:** [nick@cliffordsaviolaw.com](mailto:nick@cliffordsaviolaw.com) <[nick@cliffordsaviolaw.com](mailto:nick@cliffordsaviolaw.com)>; [matt@cliffordsaviolaw.com](mailto:matt@cliffordsaviolaw.com) <[matt@cliffordsaviolaw.com](mailto:matt@cliffordsaviolaw.com)>; Greenwood, Kelly <[kgreenwood@bjpc.com](mailto:kgreenwood@bjpc.com)>  
**Subject:** RE: Wilkens, P.E. Deposition in Francis v. Wausau Homes & Phillips Builders [BJPC-BJLIB.FID2157874]

Tanner,

I can make the afternoon of October 10<sup>th</sup> work. Please let me know the location of the deposition and the preferred start time.

Thank you,

Kristie

**BROWN & JAMES**  
LAW FIRM

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**To:** Crawford, Kristie <[kcrawford@bjpc.com](mailto:kcrawford@bjpc.com)>; [ryan@keanelawllc.com](mailto:ryan@keanelawllc.com)  
**Cc:** [nick@cliffordsaviolaw.com](mailto:nick@cliffordsaviolaw.com); [matt@cliffordsaviolaw.com](mailto:matt@cliffordsaviolaw.com); Greenwood, Kelly <[kgreenwood@bjpc.com](mailto:kgreenwood@bjpc.com)>  
**Subject:** RE: Wilkens, P.E. Deposition in Francis v. Wausau Homes & Phillips Builders [BJPC-BJLIB.FID2163789]

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Kristie,

Apologies for the delay. October 9, 10, or 11 work for us for the deposition of Mr. Wilkens. If these dates don't work for you, please let us know.

Best,

Tanner

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**Subject:** Wilkens, P.E. Deposition in Francis v. Wausau Homes & Phillips Builders [BJPC-BJLIB.FID2163789]  
**Importance:** High

Counsel,



I still need dates for Christopher Wilkens, P.E.'s deposition. I have tried to be patient but my first request for his deposition was on August 8<sup>th</sup>, over a month ago. When we spoke on September 12<sup>th</sup>, I was told you had communicated with Engineer Wilkens and just needed to confirm dates.

Wausau Homes must designate its experts by October 14<sup>th</sup>. My client's retained experts cannot provide a complete report until I know the full scope of Engineer Wilkens' opinions. Let me know if you cannot produce Engineer Wilkens and I will subpoena him for deposition. The delay in conducting this deposition has significantly impaired my ability to determine what evidence Wausau Homes' retained experts need to rebut.

I am available for Engineer Wilkens' deposition anytime next week except for October 4<sup>th</sup> during the scheduled inspection of Plaintiffs' house. I could depose Engineer Wilkens that morning or in the afternoon after the inspection. Please let me know what works for him and you.

Thank you,

Kristie



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